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September 16, 2011

The Honorable Jocelyn Boyd Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

> Petition of Sprint Spectrum, L.P., Nextel South Corp., and NPCR, Incorporated d/b/a Nextel Partners (collectively "Sprint"); T-Mobile South, LLC d/b/a T-Mobile (collectively, the "Wireless Carriers") with CTIA - The Wireless Association to Intervene and Petition to Institute Investigation of Tariff Revision No. E2011-69 of Global Tel*Link Corporation Docket No. 2011-366-C

Dear Ms. Boyd:

Re:

Enclosed for filing is AT&T Mobility's Petition to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Enclosure

cc: All Parties of Record

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BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2011-366-C

In Re: Petition of Sprint Spectrum, L.P., Nextel)
South Corp., and NPCR, Incorporated d/b/a)
Nextel Partners (collectively "Sprint"); T-Mobile)
South, LLC d/b/a T-Mobile (collectively, the)
"Wireless Carriers") with CTIA – The Wireless)
Association to Intervene and Petition to Institute)
Investigation of Tariff Revision No. E2011-69)
of Global Tel*Link Corporation)
<u>-</u>)

AT&T MOBILITY'S PETITION TO INTERVENE

Pursuant to S. C. Code Regs. 103-825, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility") respectfully requests that the Public Service Commission of South Carolina ("the Commission") allow it to intervene as a party of record in the above-captioned proceeding. In support of this request, Petitioner respectfully submits that:

- 1. AT&T Mobility is authorized to provide, and does provide, commercial mobile service as that term is presently defined in 47 U.S.C.A. Section 332(d)(1) within the State of South Carolina.
 - 2. The authorized representative of AT&T Mobility in this proceeding is:

Patrick W. Turner 1600 Williams Street, Suite 5200 Columbia, South Carolina 29201 Email: pt1285@att.com

Telephone: (803) 401-2900 Facsimile: (803) 254-1731 3. AT&T Mobility has an interest in this proceeding because it has customers who

receive calls from customers of Global Tel*Link Corporation ("Global") and, therefore, are

subject to the "Wireless Termination Surcharge" that is the subject of this proceeding. AT&T

Mobility, therefore, is impacted by this surcharge.

4. Without waiving its rights to more fully set forth its position as this proceeding

progresses, AT&T Mobility is in general agreement with the objections set forth in the Petition to

Intervene and Petition to Institute Investigation that was filed by the Wireless Carriers and the

CTIA on September 2, 2011.

5. Granting this Petition will not cause any undue delay, and it will not prejudice any

party to this proceeding.

WHEREFORE, based on the foregoing, AT&T Mobility respectfully requests the

following relief:

that it be allowed to intervene as a formal party of record in this proceeding by this

Commission's granting this Petition to Intervene;

that any parties of record be directed to provide it with a copy of any pleadings, testimony

and exhibits or any other filings made in this proceeding; and

that the Commission grant such other relief as it deems just and proper.

Respectfully submitted on this 16th day of September, 2011.

Patrick W. Turner

1600 Williams Street, Suite 5200

Columbia, South Carolina 29201

(803) 401-2900

ATTORNEY FOR NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T

MOBILITY

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC. d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T Mobility's Petition to Intervene in Docket No. 2011-366-C to be served upon the following on September 16, 2011:

Bonnie D. Shealy, Esquire Robinson McFadden & Moore, PC Post Office Box 944 Columbia, South Carolina 29202 (GlobalTel*Link Corporation) (U.S. Mail and Electronic Mail)

Shealy Boland Reibold, Esquire Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201 (Electronic Mail)

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street
5th Floor
Columbia, South Carolina 29202
(Sprint, the Wireless Carriers with CTIA-TheWireless Association)
(Electronic Mail)

F. David Butler, Esquire Senior Counsel S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail) Joseph Melchers General Counsel S.C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Jocelyn G. Boyd, Esquire Chief Clerk S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

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